



DOCKET FILE COPY ORIGINAL

February 27, 2006

04-295

The Honorable Kevin J. Martin, Chairman
Federal Communications Commission
445 12th Street, NW
Washington, DC 20554

Dear Mr. Martin:

I am writing to you on behalf of the NorthWest Academic Computing Consortium (NWACC) to express our deep concern about the FCC's intention to expand the scope of the 1994 *Communications Assistance for Law Enforcement Act*.

While the members of NWACC recognize the need for law enforcement agencies to investigate, as efficiently as possible, the electronic communications of criminals and terrorists, the expansion of CALEA described in the FCC's order of August 2005 creates a significant financial burden for colleges and universities. Installing the network equipment at NWACC institutions needed to comply with CALEA requirements by the April 2007 deadline will cost hundreds of millions of dollars at a time when we are struggling to make higher education more affordable to prospective students.

NWACC colleges and universities respond promptly to warrants and other legal directives for electronic surveillance. It is not at all clear to us that the overhaul of institutional voice and data networks will improve surveillance efficiency enough to justify the costs. This appears to be a tremendously expensive solution to what may be a very limited problem.

We urge the FCC to reexamine the costs and benefits of expanding the scope of CALEA to include all higher education voice and data communications. Is such a drastic overhaul of technology infrastructure really necessary? If so, must it be done on such an aggressive timeline? At the very least, if colleges and universities are permitted to comply with CALEA by replacing their network equipment according to existing schedules, costs may be factored into their technology budgets in a more reasonable way.

No. of Copies rec'd 0
List ABCDE

Chief information officers and other representatives of the colleges and universities of the NorthWest Academic Computing Consortium would be happy to explore with you strategies to address CALEA goals without creating undue hardship for our institutions.

Sincerely yours,

A handwritten signature in black ink, appearing to read "Martin Ringle". The signature is fluid and cursive, with the first name "Martin" and last name "Ringle" clearly distinguishable.

Martin Ringle, President
NorthWest Academic Computing Consortium

Among the NWACC member institutions endorsing this letter are:

Central Washington University
Clark College
Eastern Washington University
George Fox University
Lewis and Clark College
Linfield College
Montana State University
North Dakota University System
Oregon Health and Sciences University
Oregon State University
Pacific Lutheran University
Pacific University
Portland Community College
Portland State University
Reed College
Seattle Pacific University
Seattle University
The Evergreen State College
University of Alaska System
University of Idaho
University of Oregon
University of Portland
University of Puget Sound
Washington State University
Western Washington University
Whitman College
Willamette University